

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIASUSAN KERNICK, ADMINISTRATRIX
OF THE ESTATE OF GARY BETO,
DECEASED,

Plaintiff,

vs.

NORTH BRADDOCK BOROUGH;
EAST PITTSBURGH BOROUGH;
BRADDOCK BOROUGH;
ALLEGHENY COUNTY EMERGENCY
SERVICES; ALLEGHENY COUNTY
HOUSING AUTHORITY; CARL RECH;
individually and/or as an officer of
Braddock Borough, and ADAM QUINN,
individually and/or as an officer of North
Braddock Borough,

Defendants.

SUSAN KERNICK, ADMINISTRATRIX
OF THE ESTATE OF GARY BETO,
DECEASED,

Plaintiff,

vs.

NORTH BRADDOCK BOROUGH
POLICE DEPARTMENT; EAST
PITTSBURGH BOROUGH POLICE
DEPARTMENT; BRADDOCK
BOROUGH POLICE DEPARTMENT;
and ALLEGHENY COUNTY HOUSING
POLICE DEPARTMENT,

Defendants.

CIVIL DIVISION

No: GD-14-019772

No: GD-14-021252

NOTICE OF FILING OF JOINT
PETITION FOR REMOVAL

FILED ON BEHALF OF:

EAST PITTSBURGH BOROUGH AND
EAST PITTSBURGH BOROUGH POLICE
DEPARTMENT, ONLYCOUNSEL OF RECORD FOR THIS
PARTY:Paul D. Krepps, Esquire
PA ID #73038
pdkrepps@mdwgc.comEstelle K. McGrath, Esquire
PA ID #87799
ekmcgrath@mdwgc.comMARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
Firm ID #309U.S. Steel Tower, Suite 2900
600 Grant Street
Pittsburgh, PA 15219
(412) 803-1140
(412) 803-1188 Fax

JURY TRIAL DEMANDED



No: GD-14-019772
No: GD-14-021252

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA**

SUSAN KERNICK, ADMINISTRATRIX) **CIVIL DIVISION**
OF THE ESTATE OF GARY BETO,)
DECEASED,)
Plaintiff,) **No: GD-14-019772**
vs.) **No: GD-14-021252**

NORTH BRADDOCK BOROUGH; EAST)
PITTSBURGH BOROUGH; BRADDOCK)
BOROUGH; ALLEGHENY COUNTY)
EMERGENCY SERVICES;)
ALLEGHENY COUNTY HOUSING)
AUTHORITY; CARL RECH; individually)
and/or as an officer of Braddock Borough,)
and ADAM QUINN, individually and/or as)
an officer of North Braddock Borough,)
Defendants.)

SUSAN KERNICK, ADMINISTRATRIX)
OF THE ESTATE OF GARY BETO,)
DECEASED,)
Plaintiff,)
vs.)

NORTH BRADDOCK BOROUGH)
POLICE DEPARTMENT; EAST)
PITTSBURGH BOROUGH POLICE)
DEPARTMENT; BRADDOCK)
BOROUGH POLICE DEPARTMENT;)
and ALLEGHENY COUNTY HOUSING)
POLICE DEPARTMENT,)
Defendants.)

NOTICE OF FILING OF JOINT PETITION FOR REMOVAL

Pursuant to 28 U.S.C. §1446, you are hereby notified that the Defendants, **EAST
PITTSBURGH BOROUGH AND EAST PITTSBURGH BOROUGH POLICE
DEPARTMENT, ONLY**, in the above-captioned action have on this date filed a Joint Petition

No: GD-14-019772
No: GD-14-021252

for Removal of this action from the Court of Common Pleas of Allegheny County, Pennsylvania, to the United States District Court for the Western District of Pennsylvania. A copy of the Joint Petition for Removal is attached as Exhibit "A".

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

By: s/ Paul D. Krepps
PAUL D. KREPPS, ESQUIRE
ESTELLE K. McGRATH, ESQUIRE
**Counsel for Defendants, East Pittsburgh
Borough and East Pittsburgh Borough Police
Department**

CERTIFICATE OF SERVICE

I hereby certify that I have served upon all counsel listed below a true and correct copy of the within ***NOTICE OF FILING OF JOINT PETITION FOR REMOVAL*** in the above-captioned matter this 21st day of January, 2015, by U.S. First Class mail, postage pre-paid, upon the following:

Walter J. Nalducci, Esquire
Julianne Cutruzzula Beil, Esquire
Cutruzzula & Nalducci
3300 Grant Building
310 Grant Street
Pittsburgh, PA 15219
(Counsel for Plaintiff)

Lee Dellecker, Esquire
Allegheny County Law Department
300 Fort Pitt Commons Building
445 Fort Pitt Boulevard
Pittsburgh, PA 15219
(Counsel for Allegheny County Emergency Services)

Bethann R. Lloyd, Esquire
Grogan Graffam, P.C.
Four Gateway Center, 12th Floor
Pittsburgh, PA 15222
(Counsel for Defendant Allegheny County Housing Authority and Allegheny County Housing Authority Police Department)

Samuel H. Foreman, Esquire
Matthew R. Zwick, Esquire
Weber Gallagher Simpson Stapleton Fires & Newby, LLP
Two Gateway Center, Suite 1450
Pittsburgh, PA 15222
(Counsel for North Braddock Borough, Officer Adam Quinn and North Braddock Police Department)

Frank J. Lavery, Jr., Esquire
Joshua M. Autry, Esquire
Lavery Faherty
225 Market Street, Suite 304
Harrisburg, PA 17101
(Counsel for Braddock Borough, Officer Carl Rech and Braddock Borough Police Department)

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

By: s/ Paul D. Krepps
PAUL D. KREPPS, ESQUIRE
ESTELLE K. McGRATH, ESQUIRE
**Counsel for Defendants, East Pittsburgh
Borough and East Pittsburgh Borough Police
Department**